

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**ENTERED**

March 11, 2024

Nathan Ochsner, Clerk

In re:

FREE SPEECH SYSTEMS, LLC.,

Debtor.§
§
§
§
§

Case No. 22-60043

Chapter 11 (Subchapter V)

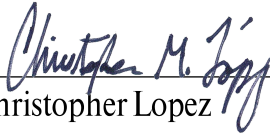
**AGREED ORDER GRANTING EMERGENCY MOTION OF THE LAW OFFICES OF
RAY BATTAGLIA, PLLC, TO WITHDRAW AS COUNSEL FOR FREE SPEECH
SYSTEMS, LLC**

On this day came on for consideration the *Emergency Motion of The Law Offices of Ray Battaglia, PLLC, to Withdraw as Counsel For Free Speech Systems, LLC* (the “Motion”) seeking an Order approving the Withdrawal of The Law Offices of Ray Battaglia, PLLC and its attorneys from representation of Free Speech Systems, LLC in the above styled chapter 11 case and all adversary proceedings filed in that case, and it appearing that notice, and service of such Motion has been made in accordance with the Federal Rules of Bankruptcy Procedure and the Local Rules promulgated thereunder, and after considering the pleadings of record and the arguments of counsel; and upon the Court's finding that (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b); and (iii) venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED THAT:

1. The Motion is Granted.
2. Upon entry of an order approving new counsel, the Law Offices of Ray Battaglia, PLLC and its attorneys are authorized to withdraw as counsel for Free Speech Systems, LLC in this bankruptcy case and all adversary proceedings pending in this bankruptcy case and are relieved of further responsibility in those matters effective on the date of this Order.

3. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Signed: March 11, 2024



Christopher Lopez
United States Bankruptcy Judge

AGREED:

THE LAW OFFICES OF RAY BATTAGLIA, PLLC.

By: /s/ Raymond W. Battaglia

Raymond W. Battaglia
Texas Bar No. 01918055
66 Granbury Circle
San Antonio, Texas 78218
Telephone (210) 601-9405
Email: rbattaglia@outlook.com

MOVANT

O'CONNORWECHSLER PLLC

/s/ Annie E. Catmull

Annie E. Catmull (Texas Bar No. 00794932)
4400 Post Oak Parkway, Suite 2360
Houston, Texas 77027
Telephone: (281) 814-5977
Email: accatmull@o-w-law.com

PROPOSED COUNSEL FOR THE DEBTOR

United States Bankruptcy Court
Southern District of Texas

In re:
Free Speech Systems LLC
Official Committee of Unsecured Creditor
Debtors

Case No. 22-60043-cml
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0541-4
Date Rcvd: Mar 11, 2024

User: ADIuser
Form ID: pdf002

Page 1 of 2
Total Noticed: 21

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
^	Addresses marked '^' were sent via mandatory electronic bankruptcy noticing pursuant to Fed. R. Bank. P. 9036.
##	Addresses marked '##' were identified by the USPS National Change of Address system as undeliverable. Notices will no longer be delivered by the USPS to these addresses; therefore, they have been bypassed. The debtor's attorney or pro se debtor was advised that the specified notice was undeliverable.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Mar 13, 2024:

Recip ID	Recipient Name and Address
db	+ Free Speech Systems LLC, 3019 Alvin Devane Blvd. STE 300, Austin, TX 78741-7417
aty	+ Harold Hap May P.C., 1500 S. Dairy Ashford Rd., Ste. 325, Houston, TX 77077-3861
aty	Kyung Shik Lee, Shannon & Lee LLP, Pennzoil Place-Suite 1300, HOUSTON, TX 77027, UNITED STATES
aty	+ Richard A. Cochrane, Caldwell Cassidy Curry PC, 2121 N. Pearl St., Ste. 1200, Dallas, TX 75201-2494
aty	+ Shannon & Lee LLP, 700 Milam Street, STE 1300, Houston, TX 77002-2736
aty	+ Vida Robinson, Paul, Weiss, Rifkind, Wharton & Garrison, 1285 Avenue of the Americas, New York, NY 10019-6031
intp	+ Alex E Jones, c/o Jordan & Ortiz PC, 500 N Shoreline Blvd, Ste 900, Corpus Christi, TX 78401-0658
cr	+ Ally Bank, c/o Quilling, Selander, et al, 2001 Bryan Street, Suite 1800, Dallas, TX 75201-3070
cr	+ David Wheeler, et al., c/o Cain & Skarnulis PLLC, 303 Colorado Street, Suite 2850, Austin, TX 78701-0137
cr	+ Elevated Solutions Group, LLC, c/o Walker & Patterson, P.C., P.O. Box 61301, Houston, TX 77208-1301
cr	+ Erica L. Ash, c/o Cain & Skarnulis PLLC, 303 Colorado Street, Suite 2850, Austin, TX 78701 UNITED STATES 78701-0137
cr	+ Reeves Law, PLLC, 702 Rio Grande St., Ste. 203, Austin, TX 78701-2720
cr	+ Richard M. Coan, c/o Cain & Skarnulis PLLC, 303 Colorado Street, Suite 2850, Austin, TX 78701-0137
cr	+ Security Bank of Crawford, P.O. BOX 90, Crawford, Tx 76638-0090

TOTAL: 14

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
cr	+ Email/PDF: acg.acg.ebn@aisinfo.com	Mar 11 2024 20:18:51	Ally Bank, c/o AIS Portfolio Services, LLC, 4515 N Santa Fe Ave. Dept. APS, Oklahoma City, OK 73118-7901
cr	Email/PDF: bncnotices@becket-lee.com	Mar 11 2024 20:19:16	American Express National Bank, c/o Becket and Lee LLP, PO Box 3001, Malvern, PA 19355-0701
crcm	+ Email/Text: mbrimage@akingump.com	Mar 11 2024 20:09:00	Official Committee of Unsecured Creditors of Alexa, c/o Marty L. Brimmage, Jr., Akin Gump Strauss Hauer & Feld LLP, 2300 N. Field Street, Suite 1800, Dallas, TX 75201-4675
cr	+ Email/Text: lemaster@slollp.com	Mar 11 2024 20:09:00	PQPR Holdings Limited, LLC, c/o Streusand Landon Ozburn & Lemmon LLP, attn: Stephen Lemmon, 1801 S. Mopac Expressway, Suite 320, Austin, TX 78746-9817
cr	^ MEBN	Mar 11 2024 20:06:59	Texas Comptroller of Public Accounts, Revenue Acco, Kimberly A. Walsh, PO Box 12548, Austin, TX 78711-2548
cr	^ MEBN	Mar 11 2024 20:07:02	Texas Comptroller of Public Accounts, Revenue Acco, Christopher J. Dylla, P.O. Box 12548, Austin, TX 78711-2548
cr	+ Email/Text: BKECF@traviscountytexas.gov	Mar 11 2024 20:09:00	Travis County, c/o Jason A. Starks, P.O. Box

District/off: 0541-4
Date Rcvd: Mar 11, 2024

User: ADIuser
Form ID: pdf002

Page 2 of 2
Total Noticed: 21

1748, Austin, TX 78767-1748

TOTAL: 7

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
aty		Akin Gump Strauss Hauer & Feld LLP
aty		Annie Catmull
aty		The Law Office of Liz Freeman
cr		ADP TotalSource, Inc.
wit		Charles "Charlie" Cicack
res		Cicack Holdings, LLC
intp		David Ross Jones
op		Marc Schwartz
op		Marc Schwartz
cr		Public Storage
op		Schwartz Associates, LLC
op		Schwartz and Associates, LLC
intp		Shelby A Jordan
intp		Sweetwater Holdings Group, Inc.
op		W. Marc Schwartz
cr	##+	Leonard Pozner, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700, Houston, TX 77002-6774
cr	##+	Marcel Fontaine, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin, Suite 2700, Houston, TX 77002-6774
cr	##+	Neil Heslin, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700, Houston, TX 77002-6774
cr	##+	Scarlett Lewis, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700, Houston, TX 77002-6774
cr	##+	Veronique De La Rosa, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700, Houston, TX 77002-6774

TOTAL: 15 Undeliverable, 0 Duplicate, 5 Out of date forwarding address

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Mar 13, 2024

Signature: /s/Gustava Winters